

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

**This Stipulation relates only to  
the Commonwealth, HTA and  
ERS**

**NOTICE OF WITHDRAWAL OF CLAIM NUMBER 23832 FILED BY UNIQUE  
BUILDERS, INC. AND AMENDED RESPONSE TO TWO HUNDRED NINETY-EIGHT  
OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF  
PUERTO RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY, AND THE RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO SUBSEQUENTLY AMENDED CLAIMS**

To the Honorable United States District Judge Laura Taylor Swain:

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

COMES NOW respondent Unique Builders, Inc. (“Unique”) represented by the undersigned attorney and respectfully sets forth and prays:

**Procedural Posture**

On March 12, 2021, Movants filed the Two Hundred Ninety-Eight Omnibus Objection (non-substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Retirement System of the Government of the Commonwealth of Puerto Rico to subsequently Amended Claims (docket # 16018, Case: 17-3283-LTS).

Respondents were granted until April 14, 2021 at 4:00 p.m. to file a response if needed (docket # 16018-4, Case: 17-3283 LTS).

On April 21, 2021, the Commonwealth of Puerto Rico filed a reply to Unique’s response to the Commonwealth’s objection to claim number 23832 (docket # 16513, Case No. 17 BK 03567-LTS).

**The Facts**

1. On May 25, 2018, Unique Builders, Inc. (“Unique”) filed claim number 23832 in the Puerto Rico Highways and Transportation Authority, Case No. 17 BK 03567-LTS in the aggregate amount of \$1,924,135.61.

2. On May 29, 2018, Unique filed claim number 29911 in the Puerto Rico Highways and Transportation Authority, Case No. 17 BK 03567-LTS in the aggregate amount of \$2,271,539.78.

3. Claim number 29911 amended and superseded claim number 23832.

4. That based on the Commonwealth and Unique’s pleadings there is no controversy as to the fact that Claim number 29911 amended and superseded claim number 23832 and that as of this date Claim number 29911 is deemed allowed as filed.

5. In view of the aforementioned undisputed facts Unique hereby gives notice of its withdrawal of claim number 23832, thus, Commonwealth objection to claim number 23832 by Unique, must be denied as moot.

WHEREFORE, Unique moves the Court for the entry of an order denying objection claim number 23832 as it became moot by the notice of withdrawal of claim number 23832; and further prays that the undersigned counsel be excused from the attendance to the April 28, 2021 hearing.

In San Juan, Puerto Rico this 23<sup>rd</sup> day of April 2021.

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By: */s/ José F. Cardona-Jiménez*  
USDC-PR 124504

#### CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on even date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: As per ***Exhibit 1***, and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: None

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## Service List - Exhibit 1

**(i)** Chambers of the Honorable Laura Taylor Swain:  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Suite No. 3212 New York, New York 10007-1312

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